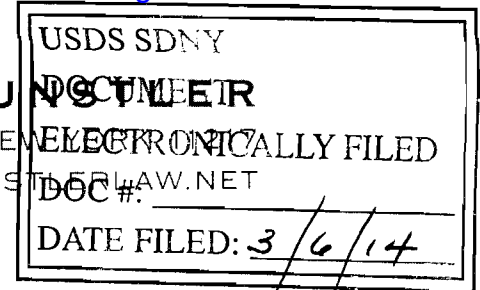


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March 5, 2014



BY ELECTRONIC MAIL

Honorable Kimba M. Wood
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Wesam El-Hanafi*, 10 Cr. 162 (KMW)

Dear Judge Wood:

MEMO ENDORSED

Please accept this letter as an update on the status of this case and a request to adjourn the status conference set for March 10, 2014. The government has reviewed this letter, concurs with the information provided, and consents to the adjournment of the status conference.

Since we last appeared before this Court, Mr. El-Hanafi has had a further hospitalization. On February 3, 2014 after an ultrasound revealed further progression of the clot in his right leg, he was admitted to The Brooklyn Hospital Center ("Brooklyn Hospital"). After consultations with specialists from Hematology and Vascular Surgery, his anti-coagulation medication was changed (from Xarelto back to Lovenox) and an IVC filter was inserted. He was discharged from the hospital on February 6. On February 19, he was returned to Brooklyn Hospital for follow-up appointments with Vascular Surgery and Hematology. Vascular Surgery recommended follow-up in five (5) months for removal of the IVC filter and Hematology recommended that he continue on the Lovenox regime.

We requested updated medical records from the Bureau of Prisons, and received a set of records covering the period between December 7, 2013 and February 25, 2014. At the Court's request, we have enclosed these records with this letter. These records include discharge summary paperwork from Brooklyn Hospital, but not the entire medical record from Mr. El-Hanafi's recent hospitalization. We have subpoenaed the complete record from Brooklyn Hospital, including ultrasound images, which we expect will be provided next week. We have also subpoenaed ultrasound images from New York Downtown Hospital that were relied upon by the government's expert, which we expect to receive at or around the same time.

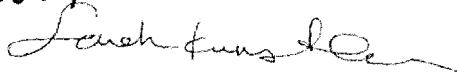
In a separate letter, submitted *ex parte* as it addresses CJA matters, we requested the appointment of a specialist to review Mr. El-Hanafi's medical records and address the conclusions reached by the government's expert. Our expert anticipates that it will take him approximately 8-10 weeks to prepare a report in this case. Once we receive the report, we anticipate that we will need two weeks to complete our submission.

Given the above, we respectfully request that the Court adjourn next week's status conference. Further, as we are still awaiting receipt of certain records outlined above that are essential to the expert's review, it is premature for us to propose a schedule for submissions at this time. We have discussed this with the government, and with the Court's permission, the parties will jointly submit a letter by March 24, 2014 outlining a proposed schedule for submissions.

March 5, 2014
Hon. Kimba M. Wood
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Thank you for your kind consideration of this request.

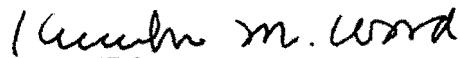
The parties shall submit a
joint letter by March 24, with
a proposed schedule for submissions,
and a proposed date for a
new conference.

Respectfully yours,

Sarah Kunstler
Rebecca Heinegg
Attorneys for Wesam El-Hanafi

CC: Aimee Hector, John Cronan, United States Attorneys
Wesam El-Hanafi

3-6-14

SO ORDERED: N.Y., N.Y.



KIMBA M. WOOD
U.S.D.J.